

REMARKS

This is a full and timely response to the non-final Office Action of January 11, 2005. Reexamination, reconsideration, and allowance of the application and all presently pending claims are respectfully requested.

Upon entry of this First Response, claims 1-35 are pending in this application. Claims 1, 9, 10, 15, 18-20, 24, and 26 are directly amended herein, and claims 33-35 are newly added. Furthermore, the specification has been amended to correct for minor errors and/or inconsistencies in the instant application. It is believed that the foregoing amendments add no new matter to the present application.

Response to Specification and Drawing Objections

The specification and drawings are objected to for allegedly having various informalities. Applicants assert that the specification has been amended herein to comply with requirements set forth in the Office Action regarding the alleged informalities. Applicants respectfully request that the objections to the specification and drawings be withdrawn.

Response to §112 Rejections

Claims 1-19 presently stand rejected under 35 U.S.C. §112, second paragraph, as allegedly failing to particularly point out and distinctly claim the subject matter which Applicants regard as the invention. In particular, it is alleged in the Office Action that the limitation "the graphical object" in claims 1, 10, 18, and 19 lacks a sufficient antecedent basis. Applicants submit that claims 1, 10, 18, and 19 have been amended herein making the foregoing rejections moot. Accordingly, Applicants respectfully request that the 35 U.S.C. §112, second paragraph, rejections of claims 1-19 be withdrawn.

Response to §102 and §103 Rejections

A proper rejection of a claim under 35 U.S.C. §102 requires that a single prior art reference disclose each element of the claim. See, e.g., *W.L. Gore & Assoc., Inc. v. Garlock, Inc.*, 721 F.2d 1540, 220 U.S.P.Q. 303, 313 (Fed. Cir. 1983).

Claim 1

Claim 1 presently stands rejected under 35 U.S.C. §102 as allegedly being anticipated by *Lake* (U.S. Patent No. 6,822,658). Claim 1, as amended, reads as follows:

1. A graphical display system, comprising:
memory for storing a parametric texture map (PTM) and a non-parametric texture map (non-PTM), ***the PTM having texels that vary based on a parameter*** and the non-PTM having texels that are constant relative to the parameter; and
a texture mapper configured to selectively render, based on one or more criteria, a PTM version or a non-PTM version of a graphical object, wherein the PTM version is based on the parametric texture map and the non-PTM version is based on the non-parametric texture map. (Emphasis added).

Applicants respectfully assert that *Lake* fails to disclose at least the features of claim 1 highlighted hereinabove. Accordingly, the 35 U.S.C. §102 rejection of claim 1, as amended, is improper.

In this regard, it is alleged in the Office Action that the “leftward-stroke” and “rightward-stroke” texture maps disclosed by *Lake* are functionally equivalent to the “parametric texture map” recited by claim 1. However, there is nothing in *Lake* to indicate that either the “leftward-stroke” texture map or the “rightward-stroke” texture map has texels that “vary based on a parameter,” as recited by claim 1.

For at least the foregoing reasons, Applicants submit that *Lake* fails to disclose each feature of pending claim 1. Accordingly, the 35 U.S.C. §102 rejection of claim 1 should be withdrawn.

Claims 2-8 and 34

Claims 2-4, 7, and 8 presently stand rejected in the Office Action under 35 U.S.C. §102 as allegedly being anticipated by *Lake*. Further, claims 5 and 6 presently stand rejected in the Office Action under 35 U.S.C. §103 as allegedly being unpatentable over *Lake* in view of *Migdal* (U.S. Patent No. 6,417,860), and claim 34 has been newly added via the amendments set forth herein. Applicants submit that the pending dependent claims 2-8 and 34 contain all features of their respective independent claim 1. Since claim 1 should be allowed, as argued hereinabove, pending dependent claims 2-8 and 34 should be allowed as a matter of law for at least this reason. *In re Fine*, 5 U.S.P.Q.2d 1596, 1600 (Fed. Cir. 1988).

Claim 10

Claim 10 presently stands rejected under 35 U.S.C. §102 as allegedly being anticipated by *Lake*. Claim 10, as amended, reads as follows:

10. A graphical display system, comprising:
memory for storing a parametric texture map (PTM) and a non-parametric texture map (non-PTM), ***the PTM having texels that vary based on a parameter*** and the non-PTM having texels that are constant relative to the parameter; and
a texture mapper configured to selectively apply, based on one or more criteria, the PTM or the non-PTM to a pixel of a graphical object. (Emphasis added).

For at least reasons similar to those set forth hereinabove in the arguments for allowance of claim 1, Applicants respectfully assert that *Lake* fails to disclose at least the features of claim 10

highlighted hereinabove. Accordingly, the 35 U.S.C. §102 rejection of claim 10, as amended, is improper and should be withdrawn.

Claims 11-14, 16, and 17

Claims 11-14 presently stand rejected in the Office Action under 35 U.S.C. §102 as allegedly being anticipated by *Lake*. Further, claim 16 presently stands rejected in the Office Action under 35 U.S.C. §103 as allegedly being unpatentable over *Lake* in view of *Migdal*, and claim 17 presently stands rejected in the Office Action under 35 U.S.C. §103 as allegedly being unpatentable over *Lake*. Applicants submit that the pending dependent claims 11-14, 16, and 17 contain all features of their respective independent claim 10. Since claim 10 should be allowed, as argued hereinabove, pending dependent claims 11-14, 16, and 17 should be allowed as a matter of law for at least this reason. *In re Fine*, 5 U.S.P.Q.2d 1596, 1600 (Fed. Cir. 1988).

Claim 18

Claim 18 presently stands rejected under 35 U.S.C. §102 as allegedly being anticipated by *Lake*. Claim 18, as amended, reads as follows:

18. A computer readable-medium having a program, the program comprising:
logic for determining a value indicative of a user's viewpoint;
logic for comparing the value to a threshold; and
logic for selecting, based on the comparing logic, between a parametric texture map (PTM) and a non-parametric texture map (non-PTM) and applying the selected texture map to a pixel of a graphical object, ***wherein texels of the PTM are defined by variable expressions*** and texels of the non-PTM are constant. (Emphasis added).

Applicants respectfully assert that *Lake* fails to disclose at least the feature of claim 18 highlighted hereinabove. Accordingly, the 35 U.S.C. §102 rejection of claim 18, as amended, is improper.

In this regard, it is alleged in the Office Action that the “leftward-stroke” and “rightward-stroke” texture maps disclosed by *Lake* are functionally equivalent to the “parametric texture map” recited by claim 1. However, there is nothing in *Lake* to indicate that either the “leftward-stroke” texture map or the “rightward-stroke” texture map has texels that “are defined by variable expressions,” as recited by claim 18.

For at least the foregoing reasons, Applicants submit that *Lake* fails to disclose each feature of pending claim 18. Accordingly, the 35 U.S.C. §102 rejection of claim 18 should be withdrawn.

Claim 19

Claim 19 presently stands rejected under 35 U.S.C. §102 as allegedly being anticipated by *Lake*. Claim 19, as amended, reads as follows:

19. A graphical display system, comprising:
means for determining a value indicative of a user’s viewpoint;
means for comparing the value to a threshold; and
means for selectively applying, based on the comparing means, a parametric texture map (PTM) and a non-parametric texture map (non-PTM) to a pixel of a graphical object, wherein ***texels of the PTM are defined by variable expressions*** and texels of the non-PTM are constant. (Emphasis added).

For at least reasons similar to those set forth hereinabove in the arguments for allowance of claim 18, Applicants respectfully assert that *Lake* fails to disclose at least the features of claim 19 highlighted hereinabove. Accordingly, the 35 U.S.C. §102 rejection of claim 19, as amended, is improper and should be withdrawn.

Claim 20

Claim 20 presently stands rejected under 35 U.S.C. §102 as allegedly being anticipated by *Lake*. Claim 20, as amended, reads as follows:

20. A graphical display method, comprising:
displaying a graphical object; and
selectively applying, based on one or more criteria, a parametric texture map (PTM) or a non-parametric texture map (non-PTM) to a pixel of the graphical object, ***the PTM having texels that vary based on a parameter*** and the non-PTM having texels that are constant relative to the parameter. (Emphasis added).

For at least reasons similar to those set forth hereinabove in the arguments for allowance of claim 1, Applicants respectfully assert that *Lake* fails to disclose at least the features of claim 20 highlighted hereinabove. Accordingly, the 35 U.S.C. §102 rejection of claim 20, as amended, is improper and should be withdrawn.

Claims 21-23, 25, and 35

Claim 21 presently stands rejected in the Office Action under 35 U.S.C. §103 as allegedly being unpatentable over *Lake*. Further, claims 22 and 23 presently stand rejected in the Office Action under 35 U.S.C. §102 as allegedly being anticipated by *Lake*, and claim 25 presently stands rejected in the Office Action under 35 U.S.C. §103 as allegedly being unpatentable over *Lake* in view of *Migdal*. In addition, claim 35 has been newly added via the amendments set forth herein. Applicants submit that the pending dependent claims 21-23, 25, and 35 contain all features of their respective independent claim 20. Since claim 20 should be allowed, as argued hereinabove, pending dependent claims 21-23, 25, and 35 should be allowed as a matter of law for at least this reason. *In re Fine*, 5 U.S.P.Q.2d 1596, 1600 (Fed. Cir. 1988).

Claim 26

Claim 26 presently stands rejected under 35 U.S.C. §102 as allegedly being anticipated by *Lake*. Claim 26, as amended, reads as follows:

26. A graphical display method, comprising:
displaying a graphical object;
selecting between a parametric texture map (PTM) and a non-parametric texture map (non-PTM) based on a value indicative of a user's viewpoint, wherein ***texels of the PTM are defined by variable expressions*** and texels of the non-PTM are constant; and
applying the selected texture map to at least a portion of a surface of the graphical object. (Emphasis added).

For at least reasons similar to those set forth hereinabove in the arguments for allowance of claim 18, Applicants respectfully assert that *Lake* fails to disclose at least the features of claim 26 highlighted hereinabove. Accordingly, the 35 U.S.C. §102 rejection of claim 26, as amended, is improper and should be withdrawn.

Claims 27-33

Claim 27 presently stands rejected in the Office Action under 35 U.S.C. §103 as allegedly being unpatentable over *Lake*. Further, claims 28-31 presently stand rejected in the Office Action under 35 U.S.C. §102 as allegedly being anticipated by *Lake*, and claim 32 presently stands rejected in the Office Action under 35 U.S.C. §103 as allegedly being unpatentable over *Lake* in view of *Migdal*. In addition, claim 33 has been newly added via the amendments set forth herein. Applicants submit that the pending dependent claims 27-33 contain all features of their respective independent claim 26. Since claim 26 should be allowed, as argued hereinabove, pending dependent claims 27-33 should be allowed as a matter of law for at least this reason. *In re Fine*, 5 U.S.P.Q.2d 1596, 1600 (Fed. Cir. 1988).

Allowable Subject Matter

Claims 9, 15, and 24 have been indicated as allowable by the outstanding Office Action if such claims are rewritten to include the limitations of their respective base claims.

Accordingly, pending claims 9, 15, and 24 have been amended herein to include features of their respective base claims. It is believed that claims 9, 15, and 24 are allowable in their present form, and Applicants respectfully request that the objections to these claims be withdrawn.

CONCLUSION

Applicants respectfully request that all outstanding objections and rejections be withdrawn and that this application and all presently pending claims be allowed to issue. If the Examiner has any questions or comments regarding Applicants' response, the Examiner is encouraged to telephone Applicants' undersigned counsel.

Respectfully submitted ,

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